

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN SECTION OF TENNESSEE
WESTERN DIVISION**

**Cortez D. Brown, Deontae Tate, and
Jeremy S. Melton on behalf of
themselves and all similarly situated
persons,**

Case No. 17-cv-02015

PLAINTIFFS,

v.

**Bill Oldham, in his individual capacity
And in his official capacity as the Sherriff
Of Shelby County, Tennessee; Robert
Moore, in his individual capacity and in
his official capacity as the Jail Director of
Shelby County, Tennessee; Charlene
McGhee, in her individual capacity and in
Her official capacity as the Assistant of
Chief Jail Security of Shelby County,
Tennessee; Debra Hammons, in her
individual capacity and in her official
capacity as the Assistant Chief of Jail
Programs of Shelby County, Tennessee;
Shelby County, Tennessee, a Tennessee
Municipality; and Tyler Technologies, Inc.,
a foreign corporation,**

DEFENDANTS

**CLASS ACCTION COMPLAINT
FOR VIOLATIONS OF THE
CIVIL RIGHTS ACT OF 1871, 42
U.S.C. § 1983, AND TENNESSEE
COMMON LAW**

**JURY TRIAL DEMANDED
PURSUANT TO FED. R. CIV.
PRO. 38(a) & (b)**

NOTICE OF APPEARANCE OF COUNSEL

COMES NOW Joseph S. Ozment, and appears as counsel on behalf of the Plaintiffs in
the above styled cause.

Respectfully Submitted,

/s/Joseph S. Ozment

Joseph S. Ozment #15601

Attorney for the Defendant

212 Adams Ave

Memphis, TN 38103

Tel. (901) 525-4357

Fax (901) 888-6826

Email: Jozment@oz-law.net

CERTIFICATE OF SERVICE

I hereby certify that a copy of this pleading has been mailed to Kathryn W. Pascover of the Shelby County Attorney's Office, Attorney for the Defendant, at the following address: 160 N. Main Street, Suite 950, Memphis, TN 38103 on January 26, 2017.

/s/Joseph S. Ozment

JOSEPH S. OZMENT